

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WESTERN TEXAS
MIDLAND/ODESSA DIVISION**

DANIELLE SPEARS
Plaintiff

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Docket Number: 7:24-cv-321

v.

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NEXT BRIDGE HYDROCARBONS, INC.
GREGORY MCCABE, JOHN BRDA
THE SECURITIES & EXCHANGE COMMISSION
FINANCIAL INDUSTRY REGULATORY AUTHORITY
JANE DOE 1-20, JOHN DO 1-20
Defendant

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**PLAINTIFF SPEARS UNOPPOSED MOTION TO
EXTEND RESPONSE TO MOTION TO DISMISS**

BY DEFENDANTS SECURITIES AND EXCHANGE COMMISSION

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES, Plaintiff Danielle Spears (hereinafter referred to as “Plaintiff”) and files this motion seeking an extension of her deadline to answer or otherwise respond to Defendants **Securities and Exchange Commission** (hereinafter referred to as “SEC”) Motion to Dismiss (Dkt. 47) and respectfully shows the Court as follows:

1. Plaintiff Danielle Spears proceeding pro se is actively preparing a detailed response to the SEC’s Motion to Dismiss.
2. Plaintiff’s response to SEC’s Motion to Dismiss is July 23, 2025.

3. Plaintiff contacted counsel for the SEC to request a two-week extension due to escalating retaliation and intimidation efforts by individuals connected to or associated with this matter. These actions have significantly disrupted Plaintiff's ability to prepare her response while continuing to compile evidentiary reports for multiple federal agencies.
4. The SEC responded that it was also managing a heavy workload and proposed a new response deadline of August 25, 2025, which Plaintiff now respectfully requests the Court adopt.
5. The SEC does not oppose this request.
6. This extension will allow Plaintiff the necessary time to finalize a complete and properly supported response. This request is made in good faith and not for purposes of delay.

Dated: July 21, 2025

Respectfully submitted,

/s/ Danielle Spears

Danielle Spears, Pro Se

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(G), the undersigned hereby certifies that, as pro se Plaintiff, she has conferred with Defendants Securities and Exchange Commission counsel Eric Reicher on or about June 10, 2025, by email and counsel indicated he is unopposed to the motion and relief requested.

/s/ Danielle Spears

Danielle Spears

CERTIFICATE OF SERVICE

I certify that I served the foregoing document on all counsel of record via the Court's CM/ECF system on July 21, 2025.

/s/ Danielle Spears

Danielle Spears

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Pending before the Court of pro se Plaintiff Danielle Spears Unopposed Motion to Extend Pleadings Deadline. Upon consideration, the Court finds that the Motion should be, and is hereby **GRANTED**.

Accordingly, it is **ORDERED** that pro se Plaintiff Danielle Spears, may answer or otherwise respond to Defendant Securities and Exchange Commission Motion to Dismiss (Dkt. 47) on or before August 25, 2025.

SIGNED this ____ day of _____, 2025.

UNITED STATES DISTRICT JUDGE